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2013 DEC -4 PM 12:25

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY ________ DEPUTY CLERK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,	§	CRIMINAL NO.: SA13CR0972 FB
Plaintiff,	§	INDICTMENT
VS.	§	[Ct 1: 18 U.S.C. § 922(g)(1) Possession of a Firearm or Ammunition By a Convicted Felon; Ct 2: 18 U.S.C. § 924(c) Carrying Firearms During and in Relation to a Drug Trafficking Crime; Ct 3: 21 U.S.C. §§ 841 (a)(1)/841(b)(1)(B) Possession with Intent to Distribute Cocaine Base.]
TYRONE STOVALL,	§	
Defendant.	§	

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 922(g)(1)]

That on or about October 3, 2013, within the Western District of Texas, the Defendant,

TYRONE STOVALL,

who having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, to-wit: a Taurus, model 85, .38 caliber revolver, serial number KA53720; which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
[18 U.S.C. § 924(c)]

That on or about October 3, 2013, in the Western District of Texas, Defendant,

TYRONE STOVALL,

did knowingly use and carry a firearm, to wit: a Taurus, model 85, .38 caliber pistol, serial number KA53720, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime that may be prosecuted in a court of the United States, that is Possession with Intent to Distribute 28 grams or more of cocaine base ("crack cocaine"), in violation of 21 United States Code §841(a)(1)/(b)(1)(B), as further described in Count Three, in violation of Title 18, United States Code, Section 924(c).

COUNT THREE
[21 U.S.C. § 841(a)(1) & (b)(1)(B)]

That on or about October 3, 2013, in the Western District of Texas, Defendant,

TYRONE STOVALL,

did unlawfully, knowingly, and intentionally possess with intent to distribute a controlled substance, which offense involved 28 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack cocaine,") a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

I.
Firearm Violations and Forfeiture Statutes
[Title 18 U.S.C. §§ 922(g)(1) and 924(c), and subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461. *See* Fed. R. Crim. P. 32.2]

As a result of the foregoing criminal violation set forth in Counts One and Two, which are punishable by imprisonment for more than one year, Defendant **TYRONE STOVALL** shall forfeit the below described property to the United States pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states the following:

> **Title 18 U.S.C. § 924**
> **(d)(1):** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922, or knowing violation of 924, or willful violation of any other provision of this chapter . . . shall be subject

to seizure and forfeiture under the provisions of this chapter. . . .

II.
Personal Property

1. Taurus, model 85, .38 caliber revolver, serial number KA53720
2. Assorted ammunition

A TR[redacted]

ROBERT PITMAN
UNITED STATES ATTORNEY

BY: ______________________________
SARAH WANNARKA
Assistant United States Attorney